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August 11, 2016

The Honorable George L. Russell, III  
United States District Court  
District of Maryland  
101 West Lombard Street  
Baltimore, MD 21201  
**Submitted via the CM/ECF system**

RE: Melvin Santiago v. The Baltimore City Police Dept.  
Civil Action No. GLR-15-3734  
*Letter Prior to Telephone Conference*

Dear Judge Russell,

Counsel for the Plaintiff and the Defendant in this case have had the opportunity to confer about the issues listed in your letter of July 25. These are addressed in turn:

1. The parties object to having the case transferred to a U.S. Magistrate Judge for all further proceedings.
2. The parties do not wish to participate in a settlement conference before the completion of discovery. If the parties jointly wish to participate in a settlement conference after the completion of discovery, they will notify the Court at that time.
3. In terms of discovery of electronically stored information ("ESI"), counsel for the Defendant is willing and able to run keyword searches on emails dating back to a certain date in 2012, but not before as broad keyword searches prior to that time are extremely expensive. Counsel for Plaintiff will not attempt to compel broad keyword searches of emails from before the date mentioned in 2012.

4. The parties would like to defer expert discovery until after summary judgment motions are resolved.
5. Given the schedules of counsel and some issues related to discovery, counsel for both parties propose extending the discovery deadline and submission of status report to February 7, 2017; the requests for admission to February 14, 2017; and the dispositive pretrial motions deadline to March 6, 2017.
6. The fifteen (15) hours of deposition time allocated per party are sufficient.
7. Counsel for the parties anticipate needing six weeks to prepare for trial if summary judgment motions are denied. We believe a trial will last eight (8) days.

Yours truly,

/s/

Curtis Cooper

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of August, 2016, that this Letter Prior to Telephone Conference has been served by the Court's CM/ECF system on:

Sharon A. Snyder, Esq.  
City Hall  
100 North Holliday Street, Room 101  
Baltimore, MD 21202  
Counsel for the Baltimore City Police Department

\_\_\_\_/s/\_\_\_\_\_  
Curtis Cooper